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Attorneys for Debtor And Defendant Mark Crone

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

MARK ELIAS CRONE

Debtor

CKR GLOBAL ADVISORS, INC,

Plaintiff,

v.

MARK ELIAS CRONE

Defendant.

Case No. 2:17-bk-12392-BR

Adv. No.: 2:17-ap-01309-BR

Chapter 7

**DECLARATION OF J'AIME WILLIAMS
IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT AND/OR
PARTIAL SUMMARY ADJUDICATION**

Hearing Date: [To Be Set By Court]
Time:
Ctrm:

I, J'aime Williams, hereby declare as follows:

1. I am over 18 years of age. I am an attorney at Leslie Cohen Law PC, bankruptcy counsel for Mark Crone, the Debtor ("**Debtor**" or "**Crone**") in the above-captioned bankruptcy case, and the Defendant in the above-captioned adversary proceeding commenced by Plaintiff CKR Global Advisors, Inc. ("**Plaintiff**" of "**Global**"). I have personal knowledge of the matters set forth below, and as to those matters based on information and belief, I believe them be true and correct, and if called to testify, I would and could competently testify thereto.

2. I submit this declaration in support of *Debtor's Notice Of Motion And Motion For Summary Judgment And/Or Partial Summary Adjudication; Memorandum Of Points And Authorities In Support Thereof* ("**Motion**") and *Debtor's Statement Of Uncontroverted Facts And Conclusions Of Law In Support Of Motion For Summary Judgment And/Or Partial Summary Adjudication* ("**SUF**"), each filed concurrently herewith. Terms herein shall have the same meaning as in the Motion and SUF.

3. Based on my review of the documents transferred to our office by the Debtor's prior counsel, it appears that on or about February 21, 2018, Global provided responses to the Debtor's discovery requests, including the RPDs ("**Global Production**").

4. On August 30, 2018, Global provided supplemental responses to the RPD's, along with 232 pages of document production ("**Supplemental Production**").

5. Based on my review of the documents produced received from Global, none of the documents produced in the Global Production or the Supplemental Production include any evidence of the Debtor's intent, the Debtor's alleged statement to his girlfriend prior to April 2016, or any evidence of damages to the Plaintiff.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of October, 2018, at Santa Monica, CA.



J'aime Williams

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
506 Santa Monica Blvd., Suite 200, Santa Monica, CA 90401

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF J'AIME WILLIAMS IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT AND/OR PARTIAL SUMMARY ADJUDICATION** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 10/23/18, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
Stephen F Biegenzahn efile@sflaw.com

Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; allie@lesliecohenlaw.com

Howard M Ehrenberg (TR) ehrenbergtrustee@sulmeyerlaw.com, ca25@ecfcbis.com; C123@ecfcbis.com;

hehrenberg@ecf.inforuptcy.com

J. Bennett Friedman jfriedman@flg-law.com, msobkowiak@flg-law.com; jmartinez@flg-law.com; ewalters@flg-law.com

United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 10/23/18, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Barry Russell
U.S. Bankruptcy Court
255 E. Temple St.
Los Angeles, CA 90012

1900 Avenue of the Stars, 11th Fl.
Los Angeles, California 90067

United States Trustee
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017

J. Bennett Friedman, Esq.
Michael Sobkowiak, Esq.
FRIEDMAN LAW GROUP, P.C.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/23/18
Date

Allie Kiekhofer
Printed Name

/s/ Allie Kiekhofer
Signature